

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

OCT 18 2012

NINA TAYLOR, *et al.*,
Plaintiffs,

v.

TURNER INDUSTRIES GROUP, LLC
AND TURNER INDUSTRIES, LLC,
Defendants.

DAVID J. MALAND, CLERK
BY
DEPUTY 30

CASE NO. 2:11-CV-57-JRG

VERDICT FORM

Question No. 1

Was any Plaintiff harassed because of his race?

Answer "Yes" or "No" for each Plaintiff listed below.

Ja'Keistan Cash	<u>NO</u>
Corey Cooper	<u>NO</u>
Stephen Dawson	<u>YES</u>
Joseph "Marquis" Finch	<u>NO</u>
Eric Jones	<u>NO</u>
Scott Matthews	<u>NO</u>
Sammy Ricks, Jr.	<u>NO</u>
Charles Sampson	<u>NO</u>
Brandon Wallace	<u>NO</u>

*If you answered “Yes” to Question No. 1 for any Plaintiff,
then answer the following Question for that particular
Plaintiff.*

Question No. 2

Did Turner know, or in the exercise of reasonable care should Turner have known, that any Plaintiff was being harassed because of his race?

Answer “Yes” or “No” for each Plaintiff listed below.

Ja'Keistan Cash	<u>NO</u>
Corey Cooper	<u>NO</u>
Stephen Dawson	<u>YES</u>
Joseph “Marquis” Finch	<u>NO</u>
Eric Jones	<u>NO</u>
Scott Matthews	<u>NO</u>
Sammy Ricks, Jr.	<u>NO</u>
Charles Sampson	<u>NO</u>
Brandon Wallace	<u>NO</u>

*If you answered “Yes” to Question No. 2 for any Plaintiff,
then answer the following Question for that particular
Plaintiff.*

Question No. 3

Did Turner fail to take prompt action to remedy such race-based harassment?

Answer “Yes” or “No” for each Plaintiff listed below.

Ja'Keistan Cash	<u>NO</u>
Corey Cooper	<u>NO</u>
Stephen Dawson	<u>YES</u>
Joseph “Marquis” Finch	<u>NO</u>
Eric Jones	<u>NO</u>
Scott Matthews	<u>NO</u>
Sammy Ricks, Jr.	<u>NO</u>
Charles Sampson	<u>NO</u>
Brandon Wallace	<u>NO</u>

Question No. 4

Did (a) Turner exercise reasonable care to prevent and promptly correct any race-based harassment, and (b) any Plaintiff unreasonably fail to take advantage of any preventive or corrective opportunities that were provided by Turner regarding such race-based harassment, or to otherwise avoid harm?

Answer "Yes" or "No" for each Plaintiff listed below.

Ja'Keistan Cash	<u>yes</u>
Corey Cooper	<u>yes</u>
Stephen Dawson	<u>no</u>
Joseph "Marquis" Finch	<u>yes</u>
Eric Jones	<u>yes</u>
Scott Matthews	<u>yes</u>
Sammy Ricks, Jr.	<u>yes</u>
Charles Sampson	<u>yes</u>
Brandon Wallace	<u>yes</u>

Question No. 5

- A. Did Turner discriminate against any of the following Plaintiffs because of his race, by means of the challenged employment action listed below?

Answer "Yes" or "No" for each Plaintiff and for each challenged employment action listed below.

Ja'Keistan Cash:	Delay of Promotion	<u>NO</u>
	Discharge	<u>NO</u>
	Failure to Rehire	<u>NO</u>
-----	-----	-----
Virgil Ethridge:	Denial of Promotion	<u>YES</u>
-----	-----	-----
Eric Jones:	Discharge	<u>NO</u>
-----	-----	-----
Sammy Ricks, Jr.:	Disparate Pay	<u>NO</u>
-----	-----	-----
Brandon Wallace:	Denial of Promotion	<u>NO</u>
	Delay of Promotion	<u>NO</u>

If you answered "Yes" to Question No. 5.A for any Plaintiff, then answer the following Question for that particular Plaintiff.

- B. What sum of money, if paid now in cash, would fairly and reasonably compensate any Plaintiff shown in Question No. 5.A for the damages for back pay and benefits, if any, you have found that Turner caused such Plaintiff?

Answer only in dollars and cents for the following items, and none other, for each Plaintiff listed below.

Ja'Keistan Cash _____
Virgil Ethridge \$ 30,000.00

Eric Jones _____

Sammy Ricks, Jr. _____

Brandon Wallace _____

If you answered "Yes" to Question No. 3 and "No" to Question No. 4 for any Plaintiff;

or

If you answered "Yes" to Question No. 5.A for any Plaintiff;

Then answer the following Question for that particular Plaintiff.

Question No. 6

What sum of money, if paid now in cash, would fairly and reasonably compensate any Plaintiff for the damages for emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life, if any, you have found that Turner caused such Plaintiff?

Answer only in dollars and cents for the following items, and none other, for each Plaintiff listed below.

Ja'Keistan Cash _____

Corey Cooper _____

Stephen Dawson \$ 2,000,000.00

Virgil Ethridge \$ 2,000,000.00

Joseph "Marquis" Finch _____

Eric Jones _____

Scott Matthews _____

Sammy Ricks, Jr. _____

Charles Sampson _____

Brandon Wallace _____

Question No. 7

Based on the evidence presented, do you find that any Plaintiff should be awarded punitive damages against Turner?

Answer "Yes" or "No" for each Plaintiff listed below.

Ja'Keistan Cash	<u>NO</u>
Corey Cooper	<u>NO</u>
Stephen Dawson	<u>NO</u>
Virgil Ethridge	<u>NO</u>
Joseph "Marquis" Finch	<u>NO</u>
Eric Jones	<u>NO</u>
Scott Matthews	<u>NO</u>
Sammy Ricks, Jr.	<u>NO</u>
Charles Sampson	<u>NO</u>
Brandon Wallace	<u>NO</u>

*If you answered “Yes” to Question No. 7 for any Plaintiff,
then answer the following Question for that particular
Plaintiff.*

Question No. 8

What sum of money should be assessed against Turner as punitive damages?

Answer in dollars and cents for each Plaintiff listed below.

Ja'Keistan Cash _____

Corey Cooper _____

Stephen Dawson _____

Virgil Ethridge _____

Joseph "Marquis" Finch _____

Eric Jones _____

Scott Matthews _____

Sammy Ricks, Jr. _____

Charles Sampson _____

Brandon Wallace _____